



DEPARTMENT OF HEALTH AND ENVIRONMENT  
To: Hazardous Waste  
C: Insp. & Enforcement  
File

RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLIST

A. General

Date 4-20-88 Time \_\_\_\_\_ EPA ID No. KSD000203638  
Facility Name Olin Water Services  
Street 3155 Fiberglass Road  
City Kansas City, , Kansas Zip 66115  
County Wyandotte Phone 913-621-6440  
Contacts Wm. E. Dame, Plant Mgr. - Larry Prouty, Environmental Affairs  
Inspector Dale L. Wing  
Other Janel J. Rogers, KDHE - John W. Bosky, EPA

B. Hazardous Waste Determination

262.11

1. Does generator generate waste(s) listed in 261.31, 261.32, or 261.33? YES NO  
If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart D, and quantity/month:

<u>EPA Hazardous Waste No.</u>	<u>Describe Waste Material</u>	<u>Quantity/Month</u>	<u>Method of Disposal</u>
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See Supplements.

2. Does generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? YES NO

- a. If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart C, and quantity.

<u>EPA Hazardous Waste No.</u>	<u>Waste Material</u>	<u>Quantity/Month</u>	<u>Method of Disposal</u>
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See Supplements



- b. Does generator determine characteristics by testing or by applying knowledge of processes? Explain below:

Testing and product knowledge.

1. If determined by testing, did generator use test method 261.21, 261.22, 261.23, or 261.24 or was equivalent test method used? \_\_\_\_\_ ( YES) NO NA

- a. If equivalent method used, obtain copy of test method.

3. Are there any other wastes generated by generator? YES NO

- a. If yes, list below:

<u>Waste Description</u>	<u>Method of Disposal</u>
Waste Oil	Accumulating for recycler
Paint Filters	
Refuse	Permitted Sanitary Landfill

- b. Did the generator test these wastes to determine if hazardous? YES (NO) NA

Explain if necessary:

Product information needed on spray paints and primers used on manufactured products. Need to determine lising of waste paint booth filters.

4. Generator size classification:

- a. Does firm generate less than 75 kg of hazardous waste per month (Small quantity generator)? YES NO
- b. Does firm generate 75 kg or more but less than 1,000 kg. of hazardous waste per month (Kansas generator)? YES NO
- c. Does firm generate more than 1,000 kg of hazardous waste per month (EPA generator)? YES NO
- d. T/S/D Facility (Storage)

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Hazardous waste determination requirements:

[ ] Adequate [X] Inadequate

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If generator generates less than 100 kg. of hazardous waste per month or accumulates less than 1,000 kg. stop here.  
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C. Manifest

- 262.21 1. Does generator ship waste off-site? ( YES) NO
- a. If yes, does manifest include:
1. Manifest document number? (YES) NO
  2. Generator's name, address, phone number, and EPA ID number? (YES) NO
  3. Name and EPA ID number of each transporter? (YES) NO
  4. Name, address, and EPA ID number of designated facility? (YES) NO
  5. Name, address, and EPA ID number of alternate facility if any. (The generator may also provide instructions to return waste to generator if undeliverable)? YES NO ( NA)
  6. Waste information required by DOT-Shipping name, (49 CFR 172.101, 172.202, 172.203) total quantity, type and number of containers? ( YES) NO
  7. Certification information - "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to applicable regulations of DOT and EPA"? ( YES) NO
- 262.23 b. Does generator retain copies of manifest? ( YES) NO  
If yes, complete 1 through 4.
1. Does generator sign and date all manifests by hand? ( YES) NO NA
  2. Does generator obtain handwritten signature and date of acceptance from initial transporter? ( YES) NO NA
  3. Does generator retain copy of manifest signed by both generator and transporter? ( YES) NO NA
- 262.40 4. Does generator retain copy of manifest signed and dated by T/S/D facility owner/operator for three years? ( YES) NO NA

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Manifesting requirements:

[ ] Adequate [ ] Inadequate

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D. Pre-Transport Requirements

- 262.30 1. Does generator package waste in accordance with DOT requirements (49 CFR 173, 178, and 179)? (YES) NO NA
- 262.31 2. Does generator label each package in accordance with DOT requirements (49 CFR 172)? (YES) NO NA
- 262.32 3. Does generator mark each package in accordance with DOT requirements (49 CFR 172)? (YES) NO NA
4. Does generator mark each container of 110 gallons or less as below: (YES) NO NA

Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. E.P.A.

Generator's Name and Address \_\_\_\_\_

Manifest Document Number \_\_\_\_\_

- 262.33 5. Does generator have placards to offer to transporters (49 CFR 172, Subpart F)? (YES) NO NA

Some labels on drums in storage are becoming weathered and difficult to read.  
Recommend the replacement of labels as needed.

Pre-transport requirements:

☒ Adequate      ☐ Inadequate

E. Record Keeping and Reporting

- 262.40 1. Does generator keep a copy of completed manifests from designated facilities for three years? (YES) NO
2. Does generator keep a copy of each Annual Report and Exception Report for three years? (YES) NO NA
3. Does generator keep records of test results and waste analyses used in determining hazardous or non-hazardous nature of wastes for three years? (YES) NO NA

Copy of the 1985 annual report could not be located at the time of the inspection.

Record keeping and reporting requirements:

☒ Adequate      ☐ Inadequate

F. Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste? YES (NO)



- a. ☐ yes, has generator filed a no ☐ with the Regional Administrator? YES NO ( NA)
- b. Is waste manifested and signed by foreign cosignee? YES NO ( NA)
- c. If generator transports wastes out of the country, has confirmation of delivered shipment been received? YES NO ( NA)

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Special conditions requirements:

[ x ] Adequate [ ] Inadequate

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G. Accumulation Time

- 262.34 1. Does generator temporarily store waste before transport for 90 days or less? (YES) NO NA
- a. If yes, is waste placed in containers? (YES) NO NA
- If yes,
1. Check overall condition of containers.
- 265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (YES) NO NA
- 265.174 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? (YES) NO NA
- 265.176 4. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? (YES) NO NA
- 265.177 5. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other device? YES (NO) NA
- b. If yes, is waste placed in tanks? YES (NO) NA
- If yes, fill out tanks checklist except 265.193.
2. Is the date accumulation began clearly marked and visible for inspection on each container? (YES) NO NA

3. Is each containers and tank labeled marked clearly with the words "Hazardous Waste"? (YES) NO NA

Note: If storage period exceeds 90 days then the facility is also a T/S/D facility. If facility is a T/S/D, go to T/S/D checklist here.

Laboratory chemical waste is not included in Part B of permit. To remain in compliance these materials must be removed from the facility before the storage exceeds 90 days. (Tom Gross 4/22/88 by phone).

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Accumulation time requirements:

☒ Adequate      ☐ Inadequate      ☐ Not Applicable

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If generator is a Kansas generator stop here.  
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H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)

1. Does the owner/operator maintain at the facility, the following documents and records:
  - a. Job title and job description for each position related to hazardous waste management? (YES) NO
  - b. Description of type and amount of training to be given each person? (YES) NO
  - c. Records of training given to facility personnel? (YES) NO

EPA inspector advises that training records need additional detail regarding the type of training given.

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Personnel training requirements:

☒ Adequate      ☐ Inadequate      ☐ Not Applicable

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2. The generator who accumulates waste on-site must meet the following requirements of preparedness and prevention (Subpart C):

265.31

- a. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES (NO)
- b. If applicable to the facility, is the facility equipped with:
  1. Internal communication or alarm system easily accessible in case of emergency? (YES) NO NA
  2. Telephone, hand-held two-way radio capable of summoning emergency response personnel? (YES) NO NA

- |        |    |  |             |
|--------|----|--|-------------|
|        | c. | Are portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment provided?   | (YES) NO NA |
|        | d. | Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?   | YES NO NA   |
| 265.33 | e. | Is this equipment (a-d above) tested and maintained to assure its proper operation?  | (YES) NO NA |
| 265.35 | f. | Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?  | (YES) NO NA |
| 265.37 | g. | If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? | (YES) NO NA |
|        | h. | In areas where more than one police and fire department might respond, is there one designated authority?  | YES NO (NA) |
|        | i. | If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?  | (YES) NO NA |
|        | j. | If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility?  | (YES) NO NA |
|        | k. | In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record?  | YES NO (NA) |

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Preparedness and prevention requirements:

☒ Adequate      ☐ Inadequate      ☐ Not Applicable

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3. The generator who accumulates waste on-site must also meet the contingency plan and emergency procedures requirements (Subpart D):

- 265.53 a. Is a contingency plan maintained at the facility have copies been provided to outside agencies which may be called upon to provide emergency services? (YES) NO
- 265.52 b. Does the plan describe arrangements made with emergency response personnel? YES NO
- c. Does the plan list the name(s), home address, and phone numbers of designated emergency coordinator(s)? (YES) NO
- d. Is an emergency coordinator available at all times? (YES) NO
- e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (YES) NO
- f. Does the plan include an evacuation plan for facility personnel? (YES) NO

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Contingency plan and emergency procedures requirements:

☒ Adequate    ☐ Inadequate    ☐ Not Applicable

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Note: Determine if generator claims any information confidential.

Note: Complete section "I" only for those generators that also transport hazardous waste. This section should also be used for commercial transporting companies.

I. Transporter Requirements

1. In addition to the requirements for manifests given in section C(1)(a)(1) through section C(1)(a)(6) above, does the manifest include:
- 263.20 a. Signature of subsequent transporters, if any? YES NO (NA)
- b. Signature signifying proper delivery to designated or alternate designated facility? YES NO
2. If the transporter transports wastes outside of U.S. do manifests show date waste left U.S.? YES NO NA
- 263.22 3. Does transporter keep copy of the manifest signed by generator, himself, and the next designated transporter or owner of T/S/D facility for three years? YES NO

4. Are containers properly labeled and marked in accordance with DOT requirements (49 CFR 172)? YES NO
5. Are vehicles properly placarded (49 CFR 172.500)? YES NO

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Transporter requirements:

☐ Adequate      ☐ Inadequate      ☒ Not Applicable

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Additional Information and CONCLUSIONS

Assorted laboratory chemicals have accumulated which are outdated or unusable.

This waste has been packaged, labeled and dated as hazardous waste. This material is not included on the facilities permit and cannot be stored for more than 90 days (Tom Gross 4/22/88).

A copy of the 1985 annual report shall be placed in the facility file.

MSDS information or testing information needed to determine the management of paint booth filters.

Weather labels on drums in the storage area need to be replaced.

(Note) No date should be put on the containers in the satellite storage areas until the container is full.

An inventory of the laboratory waste products shows the packing of incompatible items in the same bulk container.

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Form: GT 1/84  
81-J



Supplement A: Olin Water Services Inspection

B. Hazardous Waste Determination

262.11	1. EPA Hazardous Waste No.	Describe Waste Material	Quantity/Month	Method of Disposal
	F001	Spent Methylene chloride		
	F002	1,1,2-Trichloro-1,2,2-trifluoroethane		
	F003	Acetone		
	<del>U031</del> → F003	n-Butyl alcohol		
	<del>U070</del> → F002	O-Dichlorobenzene		
	U114	Carbamodithioic acid		
	U133	Hydrazine		
	<del>U242</del> → F007	Pentachlorophenol (Sodium pentachlorophenate)		

2.	EPA Hazardous Waste No.	Waste Material	Quantity/Month	Method of Disposal
	D001	Waste Lab. Solvents		
	D002	Various chemicals		
	D003	and wastes now in		
	D007	storage		

This facility is permitted as a storage facility, and has accumulated small quantities of assorted wastes from laboratory activities, cleanup, and the return of company products.

Examples: 1218 pounds of waste D007 from cleaning drain systems (in storage) - 366 pounds Sodium Pentachlorophenate (in storage) D001 lab solvents (in storage).

Material Safety Data Sheets or test results needed on spray paints and primers used on manufactured products. This information is needed to determine the disposition of paint filters from the paint booth.

Quantities?  
How  
disposed?

~~SK-3~~

Supplement B

Allen Water Services  
K.C. Mo.

To Larry  
8-20-89

Box 1

1 X 40z

Oxalic Acid

Jayco

# 13022

1 X 16oz

Barium Chloride 10%

OWS  
2nd filled

8006

1 X 8oz

1 X 16oz

# 5005-11

New Chemical Corp

2 X 100pf

Zinc U21 V Zinc Rgt

Nach 1402

1 X 1#

Barium Chloride

OWS filled

Box 2

11 X 2oz

Zinc Rgt No 1

Jayco 839

13 X 2oz

Zinc Rgt No 3

Jayco 841

3 X 40z

Nessler Rgt APHA

Nach 151

2 X 8oz

Veronate Buffer Soln

OWS

8120

2nd  
filled

1 X 32oz

Box 3

2 X 40z

Cyclohexanone

Nach 14033

1 X 32oz

Chlorine Rgt #2

Jayco #607

32

Box 4

1 X 3202

Chromate Std D

1 X 1602

Malachite Green stain  
Total Plate Count Rgt

Concave scale  
control  
OWS label

1 X 3202  
in glass jar

Methyl Violet 6GM/GA

OWS label

Box 5

39 X 50pp

Sulfa Ver IV Sulfate Rgt

Nach 12045

1 X 100pp

Zinc Ver V Zinc Rgt

Nach 14032

Box 6

All 5000 Series 16 & 802 sample  
See Niles list

Box 8

Box 7

Sulfate Spi Broth 3 X 102

Dye Laboratory  
~~Phillips~~  
Millipore

4 wks

Total count water test

3 X 402

Jarvis Ver III

Jarvis - digner  
Rgt

Nach 2560

Box 8

9 X 402

Total Alkalinity End

Jaylor R-0645

12 X 1606

—

3 X 3202

Meta Cresol Purple

Jaylor #10036



Box 9

Can't identify by label  
on markings

Box 10

1 X 80z	Ferric Chloride	OWS <sup>filled</sup>	8838
1 X 80z	70% Sulfuric Acid	✓	8912
1 X 320z	Reversion Acid	✓	8090
1 X 80z	✓	✓	8090
1 X 80z	Reversion Neutralizer	✓	8091
1 X 80z	Potassium Hydroxide	✓	8125
2 X 20z	✓	✓	✓
1 X 40z	Sulfide 1 Rgrt	Hach	1814
1 X 40z	Sulfuric Acid std soln	Hach	413
1 X 40z	Sulfuric Acid soln 5.2N	Hach	2449
1 X 40z	Sodium Hydroxide soln 5.0N	✓	2452
1 X 20z	Normal Sulfuric Acid 4.9N	Jayco #	600

Box 10 conti

1 x 202	1M nitric Acid	lab filled	8202
2 x 202	BN Rgrt	✓	8212
1 x 202	1N. NaOH	✓	—
1 x 202	1N Hydrochloric Acid	✓	—
1 x 1602	1N — — Silver	✓	—
1 x 1602	T-1	✓	—
1 x 1602	2N. Molybdate soln <sup>luc</sup>	—	—
1 x 1602	BN-1	✓	—
1 x 802	BN Sulfuric Acid (2.87N)	Ready Chemical	8214
3 x 802	OP-3 1M nitric acid	lab filled	—
5 x 802	Chlorine Rgrt #1	Jayco	#603.
7 x 402	Silver Nitrate Std <sup>35.5</sup>	Jayco	629-

## Box 11

1 X 4oz	Nylene Cyanide FF	Vendor	Cart Rec'd properly
1 X 2oz	Diphenylthiocarbonyl	Vendor	Eastman Organic Chemicals
1 X 4oz (100 emb)	N,N-Dimethyl p-Phenylenediamine Sulfate	Vendor	City Chemical Corp
1 X 1#	Nickelous Sulfate	# 2808	J. J. Baker
1 X 1#	Phenolphthalein	2872	J. J. Baker
1 X 1.1#	Ammonium Phosphate Trichloride Ammonium Dihydrogen Phos	A-684	J. J. Baker
1 X 1#	Potassium Biphthalate	2951 Cuptas	J. J. Baker
1 X 1#	Cobalt Chloride	1-1670 Cuptas	J. J. Baker
1 X 100gram	4,4',4'' Methylidynetris (N,N-Dimethylaminol)	3651	Eastman Kodak
1 X 25gram	N-1-naphthylthylamine Dihydrochloride	4835	Eastman Kodak
2 X 100gram	N,N Dimethyl-p- phenylenediamine Sulfate	5672	Eastman Kodak

Box 12

1 X gallon  
(3/4 full)

Formaldehyde soln .3. 2106

J.T.  
BAKER

Box 13

12 X 4oz

Oxalic Acid 10%

lab  
filled

OWS 8058

Box 14

1 X 8oz

Miles dyala Citric Acid 50% w  
verna,

Miles  
Lau

1 X 32oz

Hydramin Sol 32 ppm w  
N<sub>2</sub> H<sub>4</sub>

OWS filled

1 X 4oz

Hydramin soln 25 ppm w  
N<sub>2</sub> H<sub>4</sub>

Box 15

1 X 32oz

Silver Nitrat

OWS

8065

3 X 12oz

1 X 64oz

Box 16

5 X 4oz

Sodium Carbonate

Hach

675

Box 17

Box 17

17 X 102

Diphenylcarbazide

OWS 8018

Box 18

1 X 3202

Sulfuric Acid

Vender

G. J. Baker

1 X 3202

Acetic Acid

OWS

—

2 X 12802

Molybdate Rgt 8.22

Jager # 601

Box 19

1 X 402

Sulfuric Acid soln 5.22

Hach 2442

2 X 402

Molybdate Rgt

— 2236

2 X 402

Sodium Hydroxide Soln 5.02

Hach 2450

2 X 402

Jannet Ver III Jannet-Signet

— 2560

2 X 402

C-Soln Ver

Hach 141

1 X 402

Jannet II

Hach 675

5 X 402

Hydra Ver II Hydroxine Rgt

— 1790

1 X 3202

Chromic Rgt #1

—

Box 19

1 X 32 oz	Sodium Hydroxide Std Soln	0.02N	Nach 193
2 X 20z	BN Rgt	OWS	8212
1 X 20z	TDC Molybdate Rgt	OWS	8908
1 X 20z	O-P Reagent	OWS	8206

Box 20

8 PT (3.78L) approx 1/2 full	Methyl-iso-Butyl Ketone	9322	G. J. Baker
5 X 80z	Phenolphthalein Ind	(Lab) OWS	8085
7 X 80z	Hardness Ind dly (Nach)	OWS	8050
1 X 16oz	Hydrazine Reagent B	Jaylen	#1306B
1 X 40z	Wide Range Ind. Soln	Nach	2592
1 X 20z	" " Ind.	Nach	216
2 X 80z	Bogen's Long Range pH Ind	OWS	8010
2 X 40z	Thymol Blue Ind Soln	Nach	2572
1 X 40z	Brom Thymol Blue Ind. Soln	—	255
1 X 20z	Hardness Ind	—	—

## Box 20

3 x 402 Brom Cresol Green Methyl Red Nach 451  
Ind. Soln.

3 x 402 Alizarin Yellow R Ind. Soln Nach 362

1 x 202 Total Alkalinity Ind. Taylor 645-

1 x 102 "1" Alkalinity Ind. Soln OWS 8053

## Box 21

1 x 5# Sodium Carbonate Cryst <sup>under</sup> Matheson  
Coleman & Co.

1 x 5# (approx 2 1/2#) Cupric Sulfate, Technical Cupric (1845) J. I. Baker

1 x 1# Sodium Salicylate Merch Pwd 5154 Mack & Co.

1 x 1/2# Calcium Fluoride Pwd 4-1354 J. I. Baker

1 x 1# Potassium Hydrogen Tartrate P-201/10 Fisher  
Receptalloy

1 x 1# Cupric Acetate Cryst J. I. Baker

1 x 1# Lead Carbonate Pwd 2300 Baker

1 x 1# Tartaric Acid Cryst — Baker

## Box 21

1 X 1#	Sodium Ascorbate U.S.P.-F.C.C. Sodium salt of ascorbic acid <sup>fine</sup> <sub>pure</sub>	Roche Chemical
1 X 1#	Ferric Oxalate Pure	City Chemical
1 X 1#	Sodium Tartrate 3930 <sub>Cryptine</sub>	J. J. Baker
1 X 4oz	Levigated Alumina T 71	Elmer & Amers
1 X 100gram	1,2-Naphthoquinone-4-Sulfonic Acid Sodium SALT (1372)	EASTMAN ORGANIC CHEMICAL
1 X 1/4#	Cupric Oxide pure 1814	J. J. Baker
1 X 25gram	4 - AMINOANTIPYRINE A630	BAKER
1 X 1/4#	Mercuric Iodide Red M-146	<sup>fine</sup> Scientific
1 X 10gram	Aluminum Lot 13669	K & K Lab
1 X 25gram	4 - AMINOANTIPYRINE O-1123	<sup>fine</sup> Scientific
1 X 1/4#	Ferric Ammonium Sulfate 1988	J. J. Baker
1 X 1#	Carbop V L Sodium CARboxymethylcellulose	BAIRD WYANDOTT



Box 21

2 X 1#	Ammonium Citrate Dibasic	A-663	Fisher Scientific
1 X 1/4#	Cuprous Oxide Red Pwd		Baker
1 X 10 gr(?)	CARBAZOLE CRYSTAL C.P.		Emil Greiner Co.
1 X 25 gr	TITANIUM DIOXIDE ULTRA PURE		Research Chemical
	T 1-4c		
1 X 5 GRAM	Silver Diethylidithio CARBAMATE	(711725)	Fisher Scientific



DEPARTMENT OF HEALTH AND ENVIRONMENT

To: Hazard Waste  
C: I & E  
File

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 4-20-88 Time \_\_\_\_\_ EPA ID No. KSD 000203638  
Facility Name Olin Water Services  
Street 3155 Fiberglass Road  
City Kansas City, Kansas Zip 66115  
County Wyandotte Phone 913-621-6440  
Contact Wm.E.Dame, Plant Mgr.- Larry Prouty, Environmental Affairs  
Inspector Dale L. Wing  
Other Janel J. Rogers, KDHE - John W. Bosky, EPA

B. Activity at Site

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
<input type="checkbox"/> Chem/Phys/Bio Treatment	<input checked="" type="checkbox"/> Drums	<input type="checkbox"/> Incineration
<input type="checkbox"/> Filtration	<input type="checkbox"/> Pile	<input type="checkbox"/> Landfill
<input type="checkbox"/> Incineration	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Tank, Above ground	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Reprocessing	<input type="checkbox"/> Tank, Below ground	<input type="checkbox"/> Other ( )
<input type="checkbox"/> Solvent Recovery	<input type="checkbox"/> Other ( )	
<input type="checkbox"/> Thermal Treatment		
<input type="checkbox"/> Volume Reduction		
<input type="checkbox"/> Waste Oil		
<input type="checkbox"/> Other ( )		

Comments: Facility maintains a permitted storage area.

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C. Waste Analysis Plan

265.13

1. Does facility maintain a copy of its waste analysis plan at the facility?

☒ YES ☐ NO

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters.

☒ YES ☐ NO

2. Test methods which are used to test for these parameters.

☒ YES ☐ NO

3. Sampling method used to obtain sample.

☒ YES ☐ NO

4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current.

☒ YES ☐ NO

5. For off-site facilities, the waste analyses that generators have agreed to supply.

YES ☐ NO ☒ NA

6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest.

YES ☐ NO ☒ NA

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Waste analysis plan requirements:

[x] Adequate      [ ] Inadequate

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D. Security

265.14

1. Does the facility provide either of the following:

- a. A 24-hour surveillance system? (T.V. monitoring or guards). Staff on site during normal work hours. Private security patrol provides surveillance during off hours. ☒ YES ☐ NO
- b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access). ☒ YES ☐ NO

2. Does the facility provide warning signs at entrances.
3. Does the facility consider itself exempt from security requirements?

☒ YES ☐ NO

☐ YES ☒ NO

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Security requirements:

☒ Adequate      ☐ Inadequate      ☐ Not Applicable

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E. General Inspection Requirements

265.15

1. Does the owner/operator maintain a written schedule at the facility for inspecting:
  - a. Monitoring equipment
  - b. Safety and emergency equipment
  - c. Security devices
  - d. Operating and structural equipment
2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections?
3. Does the owner/operator maintain an inspection log?
  - a. If yes, does the log contain the:
    1. Date and time of inspection
    2. Name of inspector
    3. Notation of observations
    4. Date and nature of repairs or remedial action

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

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Inspection requirements:

☒ Adequate      ☐ Inadequate

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F. Personnel Training

265.16

1. Does the owner/operator maintain at the facility, the following documents and records:

- a. Job title and job description for each position related to hazardous waste management. ☒ YES ☐ NO
- b. Description of type and amount of training to be given each person. ☒ YES ☐ NO
- c. Records of training given to facility personnel. ☒ YES ☐ NO

EPA inspector recommends additional details with regard to type of training given.  
Past deficiency corrected as noted by file.

Personnel training requirements:

☒ Adequate      ☐ Inadequate

G. Requirements For Ignitable, Reactive, or Incompatible Wastes

- |        |  |  |
|--------|--|--|
| 265.17 | 1. Does the facility handle ignitable or reactive wastes?  | <input checked="" type="radio"/> YES <input type="radio"/> NO                          |
|        | a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
|        | 2. Are smoking and open flames confined to specially designated locations?   | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
|        | 3. Are "No Smoking" signs posted in hazard areas?  | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
|        | 4. Does a check of these areas show any leakage or corrosion of containers?  | YES <input checked="" type="radio"/> NO <input type="radio"/> NA                       |
|        | 5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes?                             | YES <input checked="" type="radio"/> NO <input type="radio"/> NA                       |

Ignitable, reactive, or incompatible waste requirements:

☒ Adequate      ☐ Inadequate      ☐ Not Applicable

H. Preparedness and Prevention

- |        |   |  |
|--------|---|--|
| 265.31 | 1. Does an inspection of the facility show any evidence of fire, explosion, or contamination? | YES <input checked="" type="radio"/> NO  |
| 265.32 | 2. If applicable to the facility, is the facility equipped with:                              |  |
|        | a. Internal communication or alarm system easily accessible in case of emergency?             | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
|        | b. Telephone, hand-held two-way radio capable of summoning emergency response personnel?      | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |

- |        |   |                                      |                          |                                     |
|--------|---|--------------------------------------|--------------------------|-------------------------------------|
|        | 3. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided?  | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA            |
|        | 4. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?   | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA            |
| 265.33 | 5. Is this equipment (1-4 above) tested and maintained to assure its proper operation?  | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA            |
| 265.35 | 6. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?  | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA            |
| 265.37 | 7. If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? | <input type="radio"/> YES            | <input type="radio"/> NO | <input type="radio"/> NA            |
|        | 8. In areas where more than one police and fire department might respond, is there one designated authority?  | <input type="radio"/> YES            | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
|        | 9. If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?  | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA            |
|        | 10. If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?  | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA            |
|        | 11. In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record?  | <input type="radio"/> YES            | <input type="radio"/> NO | <input checked="" type="radio"/> NA |

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Preparedness and prevention requirements:

☒ Adequate      ☐ Inadequate

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I. Contingency Plan and Emergency Procedures

- |        |   |                                      |                          |
|--------|---|--------------------------------------|--------------------------|
| 262.53 | 1. Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services? | <input checked="" type="radio"/> YES | <input type="radio"/> NO |
| 262.52 | 2. Does the plan describe arrangements made with emergency response personnel?  | <input checked="" type="radio"/> YES | <input type="radio"/> NO |

- 265.55
3. Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)? ☒ YES ☐ NO
  4. Is an emergency coordinator available at all times? ☒ YES ☐ NO
  5. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? ☒ YES ☐ NO
  6. Does the plan include an evacuation plan for facility personnel? ☒ YES ☐ NO

Plans approved and up to date. (JJR 4/19/88)

Contingency plan and emergency procedures requirements:

☒ Adequate      ☐ Inadequate

J. Manifest System, Recordkeeping, and Reporting

- 265.71
1. Does the facility receive waste from off-site? YES ☐ NO ☒
  - a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter? YES ☐ NO ☒ NA
  - b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery? YES ☐ NO ☒ NA
  - c. Does the owner/operator retain a copy of manifest? YES ☐ NO ☒ NA
  2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? YES ☐ NO ☒
  - a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information? YES ☐ NO ☒ NA
  1. If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? YES ☐ NO ☒ NA
  2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? YES ☐ NO ☒ NA
  3. Does the owner/operator retain a copy of the shipping paper? YES ☐ NO ☒ NA
- 365.72
3. Has the facility received any shipments of waste which were inconsistent with the manifest? YES ☐ NO ☒

- 265.73
- a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? YES NO ☒ NA
  1. If no, was the Regional Administrator notified? YES NO ☒ NA
  4. Does the owner/operator keep a written operating record at the facility? ☒ YES NO
  - a. If yes, does the operating record include:
    1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? ☒ YES NO NA
    2. The location of each hazardous waste within the facility and the quantity at each location? ☒ YES NO NA
    3. Records and results of waste analyses? ☒ YES NO NA
    4. Reports and details of incidents requiring implementation of the contingency plan? YES NO ☒ NA
    5. Records and results of required inspections? ☒ YES NO NA
    6. Monitoring, testing, or analytical data? ☒ YES NO NA
    7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? ☒ YES NO NA
  - 265.76 5. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? YES ☒ NO
  - a. If yes, was an unmanifested waste report submitted to the Regional Administrator? YES NO ☒ NA

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Manifest system, recordkeeping, and reporting requirements:

☒ Adequate      ☐ Inadequate

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K. Closure and Post-Closure

- 265.112
1. Does the owner/operator have a written closure plan for the facility? ☒ YES NO
  - a. If yes, does the plan include:
    1. A description of how and when the facility will be closed? ☒ YES NO



265.118

2. If the facility is a disposal facility, does the owner/operator have a written post-closure plan?

a. If yes, does the plan include:

1. Ground-water monitoring activities and frequencies at which they will be performed?

2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?

3. The name, address, and phone number of the person or office to contact during the post-closure period?

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

YES NO ☒ NA

YES NO ☒ NA

YES NO ☒ NA

YES NO ☒ NA

# Closure and post-closure requirements:

[ X ] Adequate [ ] Inadequate

## L. Financial Requirements

265.142 1. Does the owner/operator have a written estimate of the closure cost?

☒ YES ☐ NO

265.143 2. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82).

☒ YES ☐ NO

265.144 3. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?

☒ YES ☐ NO ☐ NA

265.145 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82) ☒ YES NO NA

265.147 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82). ☒ YES NO

6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82) ☒ YES NO NA

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Financial requirements:

☒ Adequate      ☐ Inadequate

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M. Management of Containers

265.170 1. Are containers presently used to store hazardous waste? ☒ YES NO

a. If no, do not complete questions 2-5.

b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

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Condition of Containers:

☐ Adequate      ☐ Inadequate      ☐ Not Applicable

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265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? ☒ YES NO NA

265.174 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? ☒ YES NO NA

265.176 4. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line?

☒ YES NO NA

265.177 5. If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from the other materials by means of a dike, berm, wall, or other device?

☒ YES NO NA

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Management of Containers:

☒ Adequate    ☐ Inadequate    ☐ Not Applicable

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Note: Determine if owner/operator claims any information confidential.

Note: Fill out applicable checklists for specific facility types (i.e. tanks, surface impoundments, piles, land treatment, landfills, groundwater monitoring).

Additional Information and CONCLUSIONS

See remarks on generator report form.

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Form: TSD 4/82